

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI

ROBIN DURBIN,)	
)	
Plaintiff,)	
)	
)	
v.)	Case No. 15-cv-00143
)	
STATE FARM MUTUAL AUTOMOBILE)	
INSURANCE COMPANY)	
)	
Defendant.)	

NOTICE OF REMOVAL

The Petitioner, State Farm Mutual Automobile Insurance Company, defendant herein, respectfully states to the Court:

1. That there was commenced and is now pending in the Circuit Court of Jackson County, Missouri, a civil action in which Robin Durbin is the Plaintiff, State Farm Mutual Automobile Insurance Company is the Defendant, said case captioned as Robin Durbin, Plaintiff, v. State Farm Mutual Automobile Insurance Company, Defendant, Case No. 1416-CV27045.

2. That said action is a civil suit, of which this Court has original jurisdiction under the provisions of Title 28, U.S. Code, Section 1332, as amended, and is one which may be removed to this Court by Defendant, State Farm Mutual Automobile Insurance Company, pursuant to the provisions of Title 28, U.S. Code, Section 1441, in that it is a civil action wherein the matter in controversy exceeds the sum or value of Seventy-Five Thousand and No/100 Dollars (\$75,000.00), exclusive of interest and costs, and is between citizens of different states.

3. That the Petitioner shows that said cause of action involves a controversy between citizens of different states, to-wit:

- a. The plaintiff Robin Durbin is now, and was at the commencement of this action, a citizen and resident of the State of Missouri.
- b. The defendant State Farm Mutual Automobile Insurance Company is an Illinois corporation with its principal place of business in Illinois.
4. That on November 19, 2014, plaintiff filed her Petition for Damages.
5. That Defendant was served on January 27, 2015, and this Notice is therefore filed within thirty (30) days after receipt by this Defendant of a filed copy of the plaintiff's Petition for Damages.
6. That there is filed herewith as Exhibit A, and by reference made a part hereof, a true and correct copy of all process, pleadings and orders received by defendant in reference to the above-captioned matter in the Circuit Court of Jackson County, Missouri.

WHEREFORE, Petitioner prays that further proceedings in the Circuit Court of Jackson County, Missouri, be discontinued, and that this action be removed to the United States District Court for the Western District of Missouri.

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ATTORNEYS FOR DEFENDANT

STATE FARM MUTUAL AUTOMOBILE

INSURANCE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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